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February 27, 2015

VIA ECF

Honorable Vincent L. Briccetti
United States Courthouse
300 Quarropas Street -- Room 630
White Plains, New York 10601

Re: Perini/O&G, a Joint Venture v. Usiminas Mecanica S.A. et al
Civil Action No. 12 CV 1931 (VB)

Dear Judge Briccetti:

We are attorneys for plaintiff Perini/O&G, a Joint Venture in the referenced action.

We write to advise that the parties are working to conclude a settlement. As a result, we respectfully request that the Court stay all proceedings in this matter for twenty (20) days to allow the parties to complete the negotiation and execution of the settlement documents.

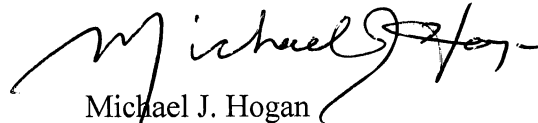
Currently, our Opposition to Defendant's Motion for Reconsideration of this Court's Memorandum Decision dated January 20, 2015 is due on March 2, 2015 and Defendant's Reply is due by March 10, 2015. In addition, a joint pre-trial order is due March 6, 2015 and a status conference is scheduled for March 13, 2015.

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One prior request for adjournments of the above scheduled dates has been requested and granted. Counsel for Defendant consents to the granting of this request. Thank you.

Very truly yours,



Michael J. Hogan

MJH:mdb

cc: Jeffrey Gilmore, Esq.